

IN THE COURT OF COMMON PLEAS, SUMMIT COUNTY, OHIO

CASE NUMBER: CV-2022-04-1173

FELICIA WASHINGTON ROSS
97 E INTERSTATE ST
Bedford, OH, 44146

-VS-

SUMMONS

PATH MASTER INC.
1960 MIDWAY DR
TWINSBURG, OH 44087

TO the following:

PATH MASTER INC.
1960 MIDWAY DR
TWINSBURG, OH 44087

You have been named as a defendant(s) in a complaint filed in the Summit County Court of Common Pleas, Summit County Courthouse, 205 S. High St., Akron, Ohio, 44308.

A copy of the COMPLAINT is attached hereto. The name and address of the Plaintiff's attorney is:

PRO SE
Same as party

You are hereby summoned and required to serve upon the attorney listed above, or upon the party if they have no attorney of record, a copy of an answer to the COMPLAINT within twenty-eight (28) days after service of this summon on you, exclusive of the day of service. Your answer must be filed with the Court within three days after the service of a copy of the answer on the attorney, or upon the party, if there is no attorney of record.

If you fail to appear and defend, judgment may be rendered against you for the relief demanded in the COMPLAINT.

Sandra Kurt
Summit County Clerk of Courts

April 22, 2022

EXHIBIT A

SANDRA KURT

2022 APR 14 PM 3:11 Summit County Common Pleas Court
General Division

SUMMIT COUNTY
CLERK OF COURTS

2022 04 1173

AMY CORRIGALL JONES

Felicia Washington Ross pro se
97 E. Interstate
Bedford Ohio, 44146

COMPLAINT

Plaintiff

-vs-

Path Master, Inc. et.al
1960 Midway Drive
Twinsburg, Ohio 44087

Defendants

1. Path Master Inc. et.al
2. Stacey Shanley
3. Bill Dinda
4. Ben Stidd
5. Larissa Mlynowski
6. Ben Cefalo
7. Stephen Manlla
8. Dennis Monson
9. Marilyn Pugh

1960 Midway Drive
Twinsburg, Ohio 44087

Felicia Washington Ross, former employee a religious, black women (person), who was engaged in a protected activity with a former employer, she was subjected to violations ORC (4112.02) unlawful discriminatory practices, by Path Master Inc and it's employees. Plaintiff was retaliated against (O.R.C 4167.13) and discharged without just cause, for reporting a hostile

offensive work environment, workplace harassment, threats of violence, stalking, discrimination (religion) (race) (she's angry) slander Ben Cefalo a employee (temp) in her head, in her mind, she's violent, her thoughts were violent, she hit me) Ethnic Intimidation (O.R.C 2927.12) defamatory) he ran and said OUCH OUCH! Bill! she's hitting me, she's hitting me to Bill the tech supervisor (Defamation of Charector) (slander) ORC 2739.01 racial slurs, deceit and lies. This incident took place (time frame George Floyd case and covid). **(During that case it was a lot of tension, many were weighing in on the outcome of the case, they were on the police officers side)** Plaintiff saw Bill, during lunch break he says ("going around hitting people shame on you") GM says! Ben Cefalo, ran in my office and caused a big scene yelling and screaming hands flying in the air saying the plaintiff attacked Him. violation (O.R.C 2739.01 slander) The GM tells the plaintiff he's upset. He's in the office (caucasian male) screaming about you attacking him. You hit him, go apologize. Plaintiff (black women) says I did not do anything wrong, GM Says go apologize anyway. He says just go apologize Minutes before this harassment, intimidation, slander, and hostile environment toward the plaintiff, she saw (Ben Cefalo), talking to Larissa. This was another plot against the plaintiff by employees to harass. Plaintiff was subjected to unethical work conditions with adverse actions of wrongful termination by Path Master. Path Master failed to comply with their company guidelines employee handbook. Path Master et.al did not prevent harassment, harassment conduct, discrimination, create an effective line of communication, establish a strict anti violence policy and encourage their employees to accept **individual differences**. There was a lack of supervision, authority and leadership from the Vice President, GM, and Tech supervisor. Path Master was not an equal employer. The plaintiff did not have the same rights as other

employees. The employees created dangerous conditions toward the plaintiff, The GM told her that she was different and did not fit. "You just don't fit in here" (O.R.C 2901.22) (ORC 2927.12) Ethnic intimidation, 2921.03 (plaintiff, religious American black women well dressed (dresses) covering her head sometimes). The harassers are Caucasian, Russian, African American male and female all used foul vulgar language with a dress code of blue jeans sweats and tennis shoes. Plaintiff was told she did not fit by management (O.R.C 4112.02) unlawful discriminatory practice (O.R.C 2927.12) (Ethnic Intimidation) which created a very hostile work Environment by which the GM condones harassment. Due to this lack of authority and condoning the harassment by Path Master employees, there was violations of O.R.C 2901.22 Culpable mental states against Felicia Workplace violence, verbal abuse, emotional abuse, bullying, threats of violence, vindictive disruptive behaviors, and stalking O.R.C 2903.211. Plaintiff had to take different routes early mornings and after work. The plaintiff saw strangers in front of her home early in the morning before going to work. In her neighborhood no one is out on the streets that early, not even to walk a dog.

The plaintiff's family saw cars adjacent to their street, the plaintiff and family were fearful for her life Criminal intent Type I Type III, Worker on Worker. Path Master employees conspired to cause fear to the plaintiff and possible harm causing mental distress by stalking her. Path Master wrongfully terminated plaintiff without just cause, by retaliation. Path Master's unlawful employment practices punished the plaintiff for reporting Civil Rights Violations. Path Master hired Plaintiff because Marilyn Pugh was resigning. A thirty year employee, who is very good close friends with the Vice President and the Tech supervisor Bill Dinda. (conflict of Interest) Path Master employees never wanted the plaintiff to work there, none of them; they gave her

mean and dirty looks daily; they made it known we want Marilyn (conflict of interest) back, you don't fit, so they chose to create a hostile environment, discriminate, harass, intimidate and stalk which violated plaintiffs rights. You dress differently, you're religious, religious people are set in a different category: you're not one of us, you don't use our kind of language. Path Master hired the plaintiff for employment. Path Master gave Marilyn a retirement party December 2020, Marilyn was back within months which caused severe hostility, unequal employment opportunity intimidation, harassment, more verbal abuse rose, which led to the stalking. Path Master are in violations of Civil Rights Acts, Ohio Anti-Retaliation law, and unlawful discriminatory practices, under a "protected activity" O.R.C. 4112.02. because the plaintiff made a charge against defendants employees, by reporting harassment, threats, and a hostile work environment. to the GM. (you don't fit your different) says the G M which are unlawful discriminatory practices. The plaintiff wanted to walk out of that office that day and quit. Plaintiff was subjected to abuse of authority, intimidation, by the GM, and Tech supervisor. There was severe hostility, intimidation and threats of violence daily as if she or her life did not matter. A temp at the time until they hired him (Ricco) employee threatened the plaintiff yelling verbal threats saying you don't want me to do what I want to you or I'd get fired. Plaintiff took those words as threats, She believed he was friends or knew the same people as Marilyn, (the retired) and other employees. Plaintiff reported the incidents and nothing was done to address the harassment Path Master hired him. They were all saying he's a good guy, I like him, even though they had acknowledgement of the harassment and violent threats. There were no meetings to address any of these incidents. Plaintiff overheard the Vice President's husband who works there (Brian), asking the harasser (Ricco) about how he

frightened her, he said "Yeah man you scared her, she was afraid", he said you shouldn't have done that, she was scared, after he threatened the Vice President they fired him, they believed her life was more important than the plaintiffs. (This all took place in the same week the plaintiff reported Larissa for calling her a B___ the same week the GM tells plaintiff that she does not fit in the company. Path Master is in violation of equal employment opportunities, violations of Lilly Ledbetter Fair Pay Act of 2009. A caucasian male received a higher pay than the plaintiff, and violations of equal pay Act 1963. Ben Cefalo, his starting pay was much higher than plaintiffs. Ben Cefalo was not asked to sign a nondisclosure agreement. Path Master told the plaintiff she had to sign a nondisclosure before she can be hired, violations of section O.R.C 4112.02. Path Master's (abuse) and condoning improper conduct in the workplace, with discrimination, (bullying) unethical behavior in the workplace, violated the health and safety (O.R.C 4101.11, 4101.12) of Plaintiff. They hated the plaintiff that much to go to the length of stalking violation (O.R.C 2903.211). November 2019 Larissa harassed and created a hostile work environment when she came up behind the plaintiff's chair and threatened her with violence. February 2020 the plaintiff reported harassment to the GM and requested that the company should have a meeting among one another to discuss issues and how to communicate because of harassment and intimidation by (Larissa). The GM said No we don't do that. You, you're different, you just don't fit (Larissa called the plaintiff a B___) the plaintiff reported the incident Larissa harasses me, creates a hostile work environment, talks loudly to other employees cursing about the plaintiff acting out in a raging manner no one ever stopped her. The plaintiff would cook Larissa did not like it; she would harass, intimidate, and voice loudly. (I don't like her) why don't she cook at her own home? I'm sick of this bull s___t. talking to employees in the

office. Plaintiff emailed the Vice President reporting harassment caused by Larissa, (caucasian Russian women) during the meeting Larissa made it voicefull to the Vice president and GM, that she did not like the plaintiff and that she believed the plaintiff should be cooking at her own home. Larissa says she thinks she's better than everybody. I don't like her. Plaintiff said I was cooking and Larissa was in my space. The GM said Oh! don't give me that bull s__t, you don't have any space, the plaintiff says I didn't want anyone to get burned, not enough space, then Larissa says why don't she cook at her own home? Look at her she thinks she's better than everybody I don't like her. In that meeting there was nothing said about the harassment the meeting had no effect on stopping the harassment or any other violations toward Felicia (plaintiff). It only got worse. Plaintiff also went to Bill Dinda, tech supervisor before emailing the vice president, who is very good friends with Marilyn the retired worker (conflict of interest) and nothing was done to stop this illegal activity. March, 2020 and April, 2020 (Ricco), violation of (O.R.C 2903.22) created a hostile work environment and threatened the plaintiff with violence nothing was done. They hired him. (Gross Negligence) November 2020 Larissa sprayed lysol spray at the plaintiff as she walked by stoking (violence) creating a hazardous atmosphere. December 21st, 2020, everyone had a chance to pick a Christmas gift, they were called to the conference room one by one, plaintiff was not called, plaintiff watched each employee as Bill Dinda and the Vice president came personally and got them to go to the conference room (discrimination plaintiff was not ever called. January, 20th 2021 Larissa harassed and intimidated the plaintiff which created a hostile work environment. The plaintiff went to get materials for her job near Larissa, because Bill said go over to Larissa and get a part, the plaintiff did as she was asked, and the plaintiff walked into a

hostile work environment. Bill never had a meeting to solve this hostile environment but he would send the plaintiff in the atmosphere of hostility. Plaintiff told Bill that Larissa wouldn't give her the part he suggested that the plaintiff should make her own. This was why the harassment never stopped, Bill and others condone this behavior. Larissa had no consequences, and if there was no material for the plaintiff to make the part, Bill would get the part from Larissa and give it to the Plaintiff. Unequal employment opportunities Larissa caucasian Russian woman, expressed repeatedly that she did not like the plaintiff she'd say I don't like you, I don't like her, she made that clear to everyone in the company, and many followed her directions of hate, discrimination and intimidation toward the plaintiff. Path Master condoned Larissa's and others behavior which created an unsafe work environment. Plaintiff did not have the same rights as all other employees; she was always targeted for harassment discrimination and intimidation, even with parking, you need to move your car. February 1st, 2021 indecent exposure a caucasian male exposed himself, sexual harassment, the plaintiff walked into her work area and was subjected to indecent exposure, right in front of her 8 feet away (standing) working with another caucasian male, his pants were down past the middle of his buttocks he had no underwear on, all of his buttocks were showing except for the lower end this is all during covid, plaintiff had asked him repeatedly if he could please wear a belt or not show his buttocks. He replied no one else has a problem with it but you, I've been doing this for years no one else has a problem with it, except you don't look. March 15th, 2021 harassed, subjected to a hostile work environment, intimidated, abuse of authority, discrimination, was told to apologize. March, 2021, Marilyn told Larissa about how they were following the plaintiff, Larissa says No No it stops here. Plaintiff was in the other room and overheard it. April 20th, 2021 reported stalking violations of O.R.C

2903.211, April 27th 2021 was called to the conference room, asked what can be done to make the stalking go away? (intimidation abuse of authority) violations of O.R.C 2903.211. May 5th, 2021 plaintiff was called into the conference room we're terminating your employment violations (O.R.C 4112.02, 4167.13), Plaintiff was told as of today we are terminating your employment. Plaintiff says you terminate me, I'm the one who gets harassed and stalked and you terminate me, the Vice President says; "yes I know what a shame". Path Master retaliated against the plaintiff because of reports of harassment, intimidation, a hostile work environment, threats and stalking.. Path Master has an employee handbook, in that employee handbook pg.16 4- 02, Path Master Inc. will generally schedule exit interviews at the time of employment termination. Why was Felicia terminated? Why did the company offer the plaintiff a settlement? Path Master knew about the stalking and harassment they saw employees waiting in their cars for the plaintiff to come out of the building. The plaintiff would not leave the parking lot for 20 minutes or more because of employees waiting for her to leave. These employees left the building minutes before the plaintiff and when she came out they were still in their cars. Gross negligence existed. Stacey could see out of her window and Bill saw the plaintiff sitting in her car, because Bill would make it known for the plaintiff to leave the building before him, (hurry up and get the F out he'd say) The plaintiff always cleaned her work area before leaving, Bill would rush her to leave. The plaintiff would still be in her car minutes after Bill left the parking lot. No one ever asked why she was still in the parking lot minutes later after leaving the building. Why did Path Master terminate the plaintiff? Was it her work ethics, attendance, or reports of violations of Civil Rights and EEO violations what made this particular termination different from being generally? This was retaliation, wrongful termination, intimidation, discrimination,

harassment, and abuse of authority. (settlement) bribery. Plaintiff followed the employee handbook. **Employee Relations** pg. 4, 1-02 1.st. paragraph; sentence 2, and 2nd. paragraph, sentence 1. for reports of harassment, intimidation, discrimination, being stalked by employees, and workplace violence (criminal intent), verbal threats, verbal harassment, Path Master did not adhere to their own policies employee handbook. (pg. 4) in either paragraph) Path Master is in violations of OSHA hazard (lack of general duty clause), Path Master did not adhere to (pg 4 **1-03 Equal Employment Opportunity paragraphs 1, 3**) which created a hostile work environment, with erratic behavior by Larissa and others, threats of physical violence, (psychological), verbal abuse. Felicia, was subjected to disruptive behavior, while being engaged in a protected activity, under **Title VII of the Civil Rights Act 1964 Equal Opportunity Employment, (full time performance of actions)** Plaintiff Felicia, had no opportunities of protection for employment, nothing was equal for plaintiff, Plaintiff was subjected to unfair treatment, bullying, negligence in employment, negligence in supervision, negligent retention, harassment, intimidation, indecent exposure, slander, racial ethnic religious discrimination, which adversely affected plaintiff mentally, emotionally, physically, psychologically depressed, any person would consider that environment to be unjust and no one should be without cause of emotional distress, and mental anguish. The weight of harassment, intimidation, stalking, discrimination was unbearable, The plaintiff, Felicia Ross, felt unsafe and fearful and applied to the employee handbook (pg. 4 1-03 paragraph 3.) When plaintiff reported the incidents, there were negative employment actions, the harassers were rewarded with no consequences the harassment continued, the plaintiff reported that she was being followed (stalked) before and after work to grocery stores, post offices, on the highway in

either direction. The plaintiff would drive 20 to 30 miles opposite of her home to try and lose these people. Plaintiff knew her surroundings. Plaintiff told the Vice President and the GM, these unlawful and unsafe dangerous criminal violations could have stopped long before the stalking had Path Master taken plaintiff seriously because people are crazy, these are chances that she could not take and that her life matters. The Vice President tells the GM I know she reported that she was fearful of her life. GM and the Tech Supervisor were very good close friends with the harassers, they believed in their friends' friendships, (conflicts of interest) Marilyn Pugh, Larissa Mlynowski, Stephen Manila, and Dennis Monson (clicks) more than safety of the plaintiff (employee) Stacey Shanley made it a point to go every day to talk and laugh for more than five minutes with these harassers, which gave them a free pass to continue to create a hostile work environment. This (gross negligence) and Condoning Civil Rights violations could have cost the plaintiff her life, (Stacey told the plaintiff in the meeting that she knew of her being fearful) no one took this seriously. Many times after the Vice President would talk to Larissa, Larissa would get even more bold with harassment. It's almost as if the Vice president told her directly it was okay go harass, with Intimidation and discrimination Pg 5. 1-04 1st. paragraph 2nd, Sentence, 2nd Paragraph, 2nd sentence, 3rd, 4th and 5th paragraph. **Personal Relationship in the Workplace** pg. 5. 5th Paragraph; Path Master Inc. and employees, caused emotional distress, mental anguish, who all acted intentionally and recklessly toward the plaintiff. Path Master did not adhere to employee handbook pg. 6 1-07 **Conflicts of interest**. Larissa Mlynowski, Marilyn Pugh Technician (retired), Dennis Monson assembly and Stephen Manila drafting/ tech. A week before plaintiff was wrongfully terminated, the vice president came to get

plaintiff from her work area, on April 27th, 2021, to go to the conference room, with Ben Stidd, GM present. The Vice president asks the plaintiff what can the company do to make the stalking go away? Plaintiff explained this is me, I cannot change who I am. This is what you get, she said she doesn't use bad language, Plaintiff said I told you when you interviewed me that I wear dresses, I don't do clicks or drama. I am me, I am a Christian this is what you get. Plaintiff also said that she believed the intimidation, stalking, harassing and creating a violent hostile work environment toward her, because of religion and work ethics, and they were trying to force her to quit. The plaintiff showed her religion through her work ethics. They all expressed her difference, many did not even have conversation they would give her mean and dirty looks daily. Plaintiff was an outstanding employee, who gave the company ideas, she just did not fit in the company (discrimination) (Civil violation) the GM says, this was personal and unethical. The following week the Plaintiff was terminated. Path Master never adhered to pg 17, of the employee handbook Safety pg. 21 workplace violence prevention, pg. 25 and ,26 Sexual and Other Unlawful Harassment pg. 28 progressive discipline There were never company meetings to address what can be done to Stop any of the Harassment, intimidation, violence, bullying, discrimination, safety or health, threats, coerces of other employees that to cause harm to plaintiff, disturbances, disrespect, sexual harassment, (indecent exposure) personal appearance, unsatisfactory conduct, unfair Practices. Stacey Shanley, the Vice President, was only concerned about her friends, not the safety of employees, or a protected citizen, That same week which was a Thursday, morning 5:00 am, to be exact, the same morning of the meeting about the stalking plaintiff heard a pop which she believed to be a gunshot near her home, which was a week before she was

terminated, she believed it to be a warning shot. Plaintiff also told the Vice President; and Ben Stidd GM, during the meeting on April, 27th 2021 about having friends as police officers, about how she told them about stalking. GM Ben Stidd was looking at the plaintiff strangely, the plaintiff asked why are you looking at me like that? she said just like when Ben Cefalo came into your office yelling and screaming a lie, that the plaintiff hit him, you were very quick to believe him, you made the plaintiff apologize, Stacey say's what does this have to do with anything we're talking about? see we're going somewhere where we don't need to be going. Plaintiff said this is important and there is a need for this to be told. The plaintiff said the GM said that if this happens again someone is going to be out of here; you also told her she did not fit, she was different. The Vice President said she had no knowledge of such an incident, the plaintiff said without any doubts you made the plaintiff apologize before you got the whole story and how you just said apologize anyhow. The Vice President said we will discuss this in another meeting later, there was no discussion the plaintiff was terminated the next week. GM of Path Master had full authority, GM told the plaintiff (you don't fit and you're different) when she reported Larissa calling her a B__h, the plaintiff wanted to walk out the door that day and quit her job she felt discriminated against, intimidated and belittled she didn't know what to do. This was a violation of equal opportunity employment, If you don't fit in that particular group you are harassed and wrongfully terminated. Stacey the Vice President plays a key role in this civil rights violation, she referred to (that thing on your head) when plaintiff wore a headdress (covering scarf), discrimination. Verbal abuse Bill, (get your s__t and get the f__k out) abuse of authority, allowed sexual harassment, Indecent exposure, bullying, and violence. Larissa Mlynowski harassed, intimidated, culprit discriminator, who came up behind the

plaintiff's chair while she was working and put fear in the plaintiff by harassing her. Marilyn, who was to the right of the plaintiff, witnessing the hostile environment Larissa says hey! you! you hear me talking to you (you're a fake I don't like you), you're a phony, grabbing on plaintiffs chair, look at me you're no Christian you think you're better you act as if you go to church look at me; I'm talking to you. I don't like you. This was direct harassment, discrimination and intimidation. Plaintiff said to Marilyn you see? I did nothing wrong, would you tell them what just happened? I'm tired of being harassed by Larissa, she said I'm not telling nothing then Marilyn then she says later that day" walking behind the plaintiff's chair that the plaintiff will mess around and get her A__ kicked" that put fear in the plaintiff, threats of violence that's why the plaintiff would try her best to not go in any vicinity that they were in. This was not a safe workplace environment. Yes! there were three other African American employees, Marilyn, Ricco and Dennis, who were harassers and stalkers also. They chose the plaintiff to harass, because (she was different) says the GM, from Marilyn and others. Path Master had company policies they did not follow There were no consequences or policies enforced to stop these violations toward the plaintiff. Larissa cursed out the plaintiff, calling her a B__h. The plaintiff would go outside on her break and come back within minutes and the doors would be locked, these doors have a lock knob, someone took the time to lock it this happened on numerous occasions. There was an eraser board that Plaintiff wrote nice things on daily, there was so much hate that someone erased what the plaintiff wrote and removed the marker, the plaintiff purchased her own that became a problem to them. The company purchased tool boxes. The plaintiff wrote on the back of her's with words saying "We All Can Do It Together" with a picture of a Black women in working clothes a head rag on her

head showing her muscles, (the picture is a replica of the caucasian women (Rosie The Riveter), the plaintiff already had the picture in her area before they purchased the tool boxes. Bill Dinda, Tech Supervisor and many others were furious that the plaintiff placed that information on the tool box. Bill Dinda said " why did you do that? you already put up an erasers board". It was so upsetting to them that the plaintiff bought a new one, and brought it to work. Before purchasing a new one, the plaintiff tried to get the wording off **We All Can Do It Together**, but it was marked with a permanent marker, the plaintiff thought It was the erase marker. Plaintiff went to the store to purchase paint, none worked to remove the words, The GM painted the back lid of the yellow tool box black weeks later. There was so much discrimination toward the plaintiff that writing positive messages was a no no or being a team player. Path Master employees made it very hard for the plaintiff to do her job to the best of her ability, because of unethical conduct. Path Master employees abuse, harassment intimidation, discrimination toward the plaintiff created hostility. This was a violation of equal employment opportunities. The environment was toxic. Larissa a caucasian Russian, told the Vice Pres and GM in 2020 she did not like the plaintiff during the meeting when they called both plaintiff and Larissa to the conference room, because plaintiff emailed the Vice president and reported harassment. Denise Monson, an employee was also a (stalker), who would sit and wait for the plaintiff to come out of the building that's when the stalking began. They followed through side streets, around the roundabouts, plaintiff would use side street to try and lose them or go to grocery stores, or get on the highway heading toward downtown Cleveland that did not work they followed her in a store (Constantino's Market).The plaintiff was getting parts in the warehouse when she overheard a conversation between the

Vice President's husband (Brian) and Dennis Monson. Dennis Monson and Marilyn are the best of friends, Plaintiff overheard Dennis Monson tell the Vice President's husband (Brian) say "if we get rid of the Common denominator", meaning plaintiff, that Marilyn Pugh, could come back (the retired) (conflict of interest) because Brian, asked when was Marilyn coming back? Marilyn (conflict of interest) violation of company policy in employee handbook. Dennis was a major part of stalking. Plaintiff was terminated, fired, because of the reports of discrimination, harassing, intimidation, stalking and bullying. Plaintiff made the complaint about the stalking, plaintiff was retaliated against and wrongfully terminated, plaintiff told the Vice president that she has police that are her friends, and told them about being followed the next week, the plaintiff was terminated. Plaintiff was stressed, could not quit and start over because she had just quite a job to come to Path Master. plaintiff listened to gospel music every day to stay calm and try and make it through the day. The Tech Supervisor, who used verbal abuse excessively toward plaintiff, worked with Marilyn Pugh, for over thirty years (conflict) wanted to oust plaintiff because she was different from all other employees, especially Marilyn. They harassed, intimidated and created a hostile work environment, because the plaintiff was no Marilyn Pugh or Larissa, being religious from a previous employee and others does not give anyone a right to harass, discriminate, intimidate, create a hostile work environment, threaten or stalk another. When that happens that is a violation of equal employment opportunities. A crime of hate and discrimination violations of Civil Rights Act 1964. Why was the plaintiff terminated? The plaintiff was treated nothing like any of the other employees, with respect, or as an equal. She was told this by the GM that she was different and did not fit in the company.

which is a violation of Civil Rights, Marilyn Pugh the retired, came back which was the key part of the discrimination, hostile environment, intimidation, violent atmosphere, harassment, and caused unequal employment opportunities. Plaintiff became an employee at Path Master, because she was called by the Vice President who stated that an employee was going to retire and that they needed Plaintiff as soon as possible. Plaintiff quit her job, to work at Path Master, not to come there and be harassed. Plaintiff asked for a higher pay. Path Master said they could not afford to increase the pay, but when temp Ben C, caucasian male came to the company he was hired with much more pay than plaintiff, same title Technician unequal opportunity violation of Lilly Ledbetter Fair Pay Act of 2009. The plaintiff was told that she would be trained to stuff cabinets and become cross trained, she was never given the opportunity as others, all technicians were crossed trained even Ben Cefalo Plaintiff cannot get a job because the plaintiff has termination on her work resume. Plaintiff worked and walked in integrity, employees did not like that Plaintiff was not Marilyn, (conflict of interest) which was a part of the problem and not the solution. Plaintiff could not communicate with others as a team player because the employees hated her. The tech Supervisor saw the harassment, intimidation, and which he used also, he knew about the threats, physical abuse, Larissa, would also drop parts on the floor near the plaintiffs area as if the plaintiff should pick them up. Someone would throw parts like screws towards the plaintiff. The plaintiff came into work one day and saw they moved Larissa further away from plaintiff, which had no effect on harassment because Larissa would make her way back down near the plaintiff and would harass and intimidate her. When the plaintiff came in any vicinity of Larissa, the plaintiff had to avoid any contact whatsoever. How can an employee do her job while trying to avoid intimidation and a

hostile environment, when there were certain parts and material she needed from the culprit? It was very difficult. Path Master violated plaintiffs rights when they condoned Larissa's behavior; they knew that there was no way for the plaintiff to do her job without being harassed by Larissa. They made it easy for Larissa and impossible for the plaintiff. Path Master made it very difficult for the plaintiff to do her job because of harassment. Larissa would make (aggressive behavior) noises and stomp her feet as if she wanted to hit the plaintiff she would make these grunt or gruff sounds. Larissa (caucasian Russian) was given a free pass to harass, intimidate with discrimination against plaintiff. The Vice President Stacey Shanley, came through daily. one day she came through the work area and the plaintiff had on a head covering. The plaintiff saw her later that day. She said I was going to come by and speak but you had that thing, that thing on your head. Plaintiff found that to be discriminatory. Ben Cefalo, communicated with Larissa more than any other employee, He learned the harassment and hostility toward plaintiff from Larissa the day plaintiff was made to apologize to Ben C. he said that's why all the other employees don't get along with you, he accused the plaintiff of hitting him. The plaintiff had to make sure she did not come in contact with many of them or be in the same area, because they would harass, intimidate, and discriminate. The plaintiff was hesitant to tell anyone about any of the violations, because she believed that if she spoke out she would be fired, and what happened when the plaintiff reported the violations? she was terminated. Path Master as a company has a very hostile work environment, the profanity, and hostility toward the plaintiff was unbearable.

April of 2020, an employee temp came in plaintiffs face and pointed his finger at her with violence and hostility (Ricco) for no reason, threats using bad language cursing

out the plaintiff, the plaintiff was explaining the role they played as coworkers (leadership), he got very aggressive, with a loud violent gesture and was very personal, nothing was said to him. the Plaintiff did not know this person at all, he came to the company with the same harassment, Intimidation, discriminatory demeanor as Larissa and others it was as if they told him there is your target. Employees at Path Master had been spreading hate toward the plaintiff, sabotaging her work. Plaintiff was quiet, calm at all times, but expressed the wrong, plaintiff did not get violent against the harassers, plaintiff was well groomed, she had very good work ethics, Integrity, attentive and courteous, but very fearful, she was explaining the job to him, his job was to receive work from plaintiff (teamwork), she could not get anything done, when being subjected to a hostile work environment, intimidated, abused, harassed with such anger, (fear) Bill never intervened as a leader, he'd just let the harassment and violence toward the plaintiff, go on, day after day. Three times this male employee got in the plaintiff's face, with loud cursing, threats. How and why was it that anyone could say or do anything to the plaintiff with no discipline, or consequences? One day Bill came and told the plaintiff that she needed to go and add something to her work, which was where the temp (Ricco) employee was working. The same employee who had a habit of threatening the plaintiff. Plaintiff walked into, anger, threats of verbal abuse, harassment and violent intentions, she walked into a hostile work environment. Plaintiff believed her work had been sabotaged. The plaintiff went and tried to complete the task (leadership, integrity). She was subjected to a hostile, intimidating, violent work environment, Bill Dinda was there in the area, plaintiff who was always confronted with abuse while doing her job. The plaintiff was hesitant in asking a particular question that the temp (Ricco) was to do, but did her job anyhow and asked. The employee says "look

I said don't F-ing talk to me" he said you act like you're the F-ing supervisor, shut the F- up talking to me, he said I told you, you don't want me to do what I want or I would get fired, This was not the first time he spoke those words, many times with threats to the plaintiff, she had no idea what he was talking about, the plaintiff has not ever seen nor does she know this person, Path Master, and Management ignored how he harassed, intimidated, and created a hostile work environment with threats to the plaintiff, they hired him and all the other techs were pleased that he harassed her, with threatening intentions which created a more hostile environment. The question is what were their reasons for this harassment and hostility toward the plaintiff? What did she do to deserve this type of treatment? He was a temp, and they hired him two weeks later after that violation of plaintiff's rights. Plaintiff told the company that something was wrong with him and she's fearful of him he continued with harassment and violence toward her they ignored it. They all would say he is a nice guy until he went off on Stacey, the Vice President, and scared her, they fired him. That is the same time when the plaintiff reported Larissa to the GM for calling her a B___h and walking pass making sounds as if she wanted to hit her. Plaintiff went to GM and reported harassment by Larissa, because this was not going away, this is not stopping,, that's when the GM says well I don't think it's that bad,, it's because you are different you just don't fit. The Plaintiff's rights, life, health and safety meant nothing until it came to the Vice President's safety. March, 2021 plaintiff was subjected to slander, harassment, discrimination, a violent hostile work environment, by another temp who they later hired after this hostility of violence, discrimination, verbal abuse, slander and Intimidation. Ben Cefalo who lied and said the plaintiff was hitting him. Ben C. claimed Felicia, was hitting him, he came and snatched a folder from Plaintiffs tools

box, Plaintiff said oh no I'll give you that Ben natches it and runs away, and says "OUCH OUCH" she's hitting me, she's hitting me, he ran to Bill and said she's hitting me, Plaintiff said I did not, I don't hit. Plaintiff was going to her car at lunch time, Bill Dinda and the GM believed the accusations, Bill Dinda said to the plaintiff "you're going around hitting people, putting your hands on people, you're going around hitting people. Plaintiff was eating lunch when the GM came and said, What the hell, Plaintiffs ask, what? What are you talking about? The GM said come with me; she said for what? He says Ben comes into the office like a crazed man, he says you hit him, he's going off his hands in the air. Felicia explains what happened then he says apologize to him (discrimination, intimidation, threats) she says for what I did nothing wrong? He says apologize anyway. Stacey Shanley, Ben Stidd and Bill Dinda, they needed no proof Stacey Shanly the Vice President, believes all black people are violent, thieves and liars (example) Path Master got a letter stating to garnish plaintiff wages, Stacey didn't tell the plaintiff until two weeks later that she received a letter about garnishing plaintiffs wages. The Vice President lied, and said she was out the week the letter arrived. She waited to tell plaintiff about the letter she claimed she was out of the office which was not true, because she's saw the Vice President that week, plaintiff said she knew nothing about it and don't garnish the wages, Stacey the Vice President says loudly for anyone to here, (slander) (Plaintiff is a very private person), Stacey said it to embarrass the plaintiff and belittle her because she is a black women, The Vice President, got very personal and said, loudly "well you must have gotten a notice at home", they said you owe this amount and I have to take it out of your pay, they said do it and I have to do it. This was not behind closed doors this was where many could hear the conversation, she has an employee that works six feet from her, and others could hear easily.

plaintiff asked to see the letter, Stacey wouldn't give the letter to the plaintiff, the plaintiff asked three times that she needs to see the letter. The Vice President finally let's her see the letter, Plaintiff believed that to be too personal, and that the only thing that was Path Master's business was to give the plaintiff the letter and let her handle her business. This was an embarrassment, (slander) because the plaintiff told the company during interview that she is a very private person and she doesn't speak about her personal life. Plaintiff said, she will call the number on the paper, and let Stacy know what's going on before she takes out the funds, more than half of plaintiffs pay, the plaintiff calls the number, no answer, she calls at least 5 times, early morning hours, because she could not afford to get funds taken out of her check, close to \$400, plaintiff got no answer, then gets a recording service that says something weird like you have reached us during none hours of operation call back at normal business hours. Plaintiff was calling during their business hours then there was a weird sound that came on saying the wrong listed number, Plaintiff told Stacey, Stacey was so sure plaintiff was lying, that she slipped the number in her desk cabinet. Stacey called it herself, and told the plaintiff your right I tried to call and I got the same thing. (discrimination) Plaintiff said she will get to the bottom of it. Stacey had already taken funds out of plaintiffs's pay. Plaintiff had to go to court and filed a claim against the persons. They were a fraud, Plaintiff had a court date, the accusers never showed, plaintiff filed a police report for identity theft, plaintiff had told Stacey that her identity was stolen. Stacey did not believe it because the plaintiff is black (racist). She believed anyone else but the plaintiff. The GM Ben Stidd, made the plaintiff apologize to Ben Cefalo. (racist) Plaintiff said she did nothing wrong, but did her job. Ben Cefalo was so dramatic, he ran telling Bill the tech supervisor, she's hitting me, she's hitting me, ouch!, ouch! she's hitting

me, plaintiff said I don't hit I'm a Christian, I don't do that, Felicia was afraid of what was going to happen next, whether to go report that incident, or just be quiet, there was no need to make a decision because Ben Stidd came and got the plaintiff and said I'm sick of this bull shit, someone is going to be out of here, if this happens again, the GM comes and says that he's in the office going off and yelling about the plaintiff, she says who? The GM says Ben says you hit him, Plaintiff explained and showed the GM what had happened that Ben Cefalo came and took and snatched her folder, which he was not to do, the plaintiff was to give it to him. He reached into her tool box and got the folder. Ben Stidd, the GM, says go apologize, go and tell him you're sorry, he said just do it. Plaintiff said she did nothing wrong, This is the same GM who told Plaintiff ("That she does not fit in the company and that she was different") and to just let it go when reports of Larissa's discriminatory actions. Plaintiff and GM' went to the area where Ben Cefalo was and she asked him, what did she do? the GM Ben Stidd, said we don't need to go back and forth about this just say you're sorry, no need, we don't have time for this Bull S__t. Ben Cefalo says ("I don't want her apology, I don't want to be anywhere around her, nowhere, near her,") and make sure I get copies of all the paperwork so I don't have to come in contact with her, Ben Stidd agreed with him, Ben C, says ("in her mind "her thoughts were angry she attacked me" she was angry), she was hitting me. These were racist slurs toward plaintiff, she believed that this was a racist, discriminatory statement that all black people are violent, and angry. Ben C. said that's why none of the other techs get along with her, she wants to keep everything. Plaintiff, said where did that come from? to speak about others saying they don't get along with her. Ben the GM says okay apologize he said I don't want her apology. Plaintiff asked where she hit him and what happened? He couldn't answer the question, he made a gesture as

if the plaintiff just brushed his arm. He said she did this and brushed his arm in a downward motion with his right pointing finger on his left bicep. Plaintiff was nowhere near his arm; she was only touching her papers. This was unlawful discrimination with intimidation toward a black women. Plaintiff said okay I will make copies, the GM agreed, Bill and all management agreed to keep Ben C, at a distance from Plaintiff (discrimination). The plaintiff was fearful to be left anywhere around him. She could not do her job to the fullest, she didn't even want to make eye contact. The atmosphere was so toxic with hostility and anger toward the plaintiff. Plaintiff was asked to sign a non disclosure before she could work at Path Master (civil rights violation) unequal employment opportunities, Ben C. was not asked, because the plaintiff asked him when he first started, She said may I ask you a question? did the company have you sign a nondisclosure)? Ben C. said no, Ben C. is a caucasian man. She asked are you sure they did not have you sign a nondisclosure? He says yes I'm sure why would I? She said because I could not work here until I signed the nondisclosure before they made me. Stacey Shanley discriminated against the plaintiff who is a black religio woman who did her job and did it better than any other employee in the company. This was racially motivated and gender discrimination, Ben C was hired with more pay. Ben C. and the plaintiff did not have that same rights. Plaintiff heard Ben C. tell another employee about how much he was getting paid, which was much more than the plaintiff. (everyone is a tech in that area) Plaintiff was subjected to racial and gender discrimination Lilly Ledbetter Fair Pay Act of 2009, and a violation of equality. The GM told the plaintiff she did not fit in the company, and that she was different. That is a discriminatory statement, Felicia was left in the dark about many things in the company. She found out from another employee that they were working a half day on Good Friday. Plaintiff

saw Bill Dinda, and said "I had no idea we were getting off early. Was there a memo? I didn't get the memo", he says there was a memo we get off early, every Good Friday, now get your S__t and get the F__K out. November 2020, The company purchased tool boxes of different colors 30 inch 4 drawer. Plaintiff had yellow and put words that said "We All Can Do This Together," Bill and others were furious, Marilyn Pugh is a retired worker. That was the reason Plaintiff was asked to come to Path Master. Plaintiff overheard Larissa telling Marilyn, loudly "No it stops here because they were talking about stalking and following the plaintiff.." ("she quotes no it Stops, It stops here! ") An employee named Dennis Monson told a Path Master, employee, that if we get rid of the common denominator which is Plaintiff, then Marilyn can come back. Plaintiff did not care who Path Master had as an employee that was none of her concern, she only cared that she had the same equal rights just as others, and a protected citizen, Path Master employees waited for the plaintiff to leave just to follow her. Plaintiff did not know what was going to happen she couldn't take anymore chances that is why she reported it to Stacey, it was getting very dangerous. The stalking was going on since December of 2020. The plaintiff's family saw these strange cars near their home, before and after going to work and strangers walking in her neighborhood early mornings. She believed they were trying to scare her to quit, but couldn't really take the chance with so much going on in the world. So she told the Vice President about the stalking and what Dennis said and she says I don't have to get rid of anyone, for Marilyn to come back, Marilyn still works here, the next week, plaintiff was wrongfully terminated and retaliated against the plaintiff telling Vice President and GM Ben, I don't use bad language. I'm a Christian, and I came to work not for friends, this is me, this is who I am, I am me, I can't change for who I am. They fired her the next

week, because they wanted her to change and fit in. During that meeting the plaintiff said you would keep Larissa, the harasser and let me go. Plaintiff says Larissa, can threaten, harass, intimidate and you terminate me. The Vice President say's yes I know, what a shame. This was discrimination intimidation violations of the **Civil Rigths act of 1964** Plaintiff says I was treated unfairly and intimidated by anyone at Path Master. The plaintiff was called in the office a week before wrongful termination, because she told The Vice President on April 20th, 2021, while on the floor about the stalking, A Path Master employee on numerous occasions exposed himself with indecent exposure, caucasian male (sexual harassment) this particular time he was standing with another employee, Plaintiff walked into the work area and low and behold his pants were practically down to his lower buttocks with no underwear in sight. Plaintiff had repeatedly asked him not to please show his buttocks, he replied, I've been here for years and the company or no one else has a problem with it, why should you? Plaintiff kept at least three men more busy, then any one person ever worked at Path Master. They couldn't keep up with her; they would sabotage the work to try and slow her down. The Vice President, GM, Tech Supervisor, Marilyn, Larissa, Stephen, Ben C, Dennis M. were all culprits in violations against plaintiff as a protected citizen. Path Master should be held liable and held accountable for violations of plaintiffs rights. The plaintiff was wrongfully terminated and retaliated against for exercising her rights. As of to this day plaintiff cannot find herself to feel safe in any company because of this termination. Plaintiff is afraid, how can she trust any company to believe in her work ethics without being discriminated against for doing her job? The plaintiff was punished for reporting, discrimination, intimidation, harassment, violence, stalking, verbal abuse, threats of violence, and a hostile work environment by employees. Plaintiff was Singled out unfairly. Path

Master, caused mental anguish in the workplace, emotional distress, intentional infliction (outrage) of emotional distress. Path Master intentionally and recklessly caused emotional distress. They did nothing to stop it, Path Master et.al conduct was extreme and outrageous. Their actions caused mental distress. Path Masters unlawful conduct was extreme ridicule, stalking (being followed and watched), indecent exposure (sexual harassment), intimidation, threats of violence, hostile work environment, verbal abuse, abuse of authority, bullying, Ben, GM (go apologize) discrimination, violence and harassment, humiliation, embarrassment, who could endure such violations? The Plaintiff's faith, and listening to gospel music kept her to do her job to the best, The stress, unlawful discriminatory practices in the workplace, what the plaintiff had to endure what was strictly illegal. The unlawful discriminatory practices in the (workplace) should not be tolerated, against any protected citizen. There was extreme and outrageous conduct, by the employer, and employees, this was intentional infliction of emotional distress. Racial slurs (she was angry, her thoughts in her mind) Plaintiff was being followed home and was being watched on the way to work, by employees, Path Master et.al, is liable for this injustice of violations of Plaintiffs rights as a protected citizen, this has gone beyond reasonable bounds of decency, The Plaintiff had to take different routes home instead of getting home at a specific time that would take an hour or two later than normal. The plaintiff heard a gunshot at 5:00 am on a Thursday morning before she was to go to work. This was unlawful, extreme and outrageous. Intentional infliction of emotional distress, This behavior was discriminatory against a protected employee, the behavior was severe and pervasive over a long period of time, the behaviors of Path Master, and employees, with unjust treatment toward the plaintiff which made it nearly impossible for the plaintiff to perform work duties to the best of

her abilities, no one should be subjected to such unlawful acts. Path Master knew about the behavior and refused to intervene. Plaintiff was frightened, in fear of her life, humiliated and embarrassed. Path Master's conduct was Felicia's distress, They were complicit, there was conflicts of interest, abuse of power, illegal and unethical behavior in the workplace, improper conduct, workplace health and safety violations, negligent hiring and retention, negligent supervision, hostile work environment, harassment, stalking, discrimination, which lead to retaliation with wrongful termination. Plaintiff was punished for engaging in legally protected activity, and suffered consequences after complaining, because of Path Masters egregious malicious misconduct, and reckless discriminatory actions, mistreatment, Path Master et.al should be held liable. **Path Master has an employee handbook which they did not adhere**

to any part of the book when it pertain to :

- 1. employee relations,**
- 2. equal opportunity employment,**
- 3. business ethics,**
- 4. personal relationship in the workplace,**
- 5. conflicts of interest,**
- 6. non-disclosure,**
- 7. safety,**
- 8. workplace violence prevention,**
- 9. employee conduct and work rules,**
- 10. sexual and other unlawful harassment,**
- 11. personal appearance,**
- 12. progressive discipline.**

Plaintiff received right to sue

Plaintiff is seeking personal relief, punitive damages, compensatory damages, emotional distress for stalking, retaliation, discrimination and wrongful termination

Plaintiff ask the courts for a jury trial

March 15,, 2022

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